

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: :
 : **Case No.: 20-20508**
Gregory A Rager : **Chapter 13**
Holly J Rager : **Judge Carlota M. Bohm**
 : *********
Debtor(s) : *****
 :
Wells Fargo Bank, N.A., d/b/a Wells : **Date and Time of Hearing**
Fargo Auto : **February 15, 2022 at 10:00 a.m.**
Movant, :
vs :
 :
Gregory A Rager :
Holly J Rager :
 :
Ronda J. Winnecour
Respondents.

NOTICE OF HEARING AND RESPONSE DEADLINE
REGARDING MOTION OF WELLS FARGO BANK, N.A., D/B/A WELLS FARGO
AUTO FOR RELIEF FROM AUTOMATIC STAY WITH 30-DAY WAIVER
(TELEPHONIC PROCEDURE EFFECTIVE MARCH 16, 2020)

TO THE RESPONDENT(S):

You are hereby notified that the Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion by no later than January 29, 2022 (i.e., seventeen (17) days after the date of service below), in accordance with the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and the general procedures of the presiding judge as found on the Court's webpage at www.pawb.uscourts.gov. If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled. The Creditor hereby waives the right under 11 U.S.C. § 362(e) to a hearing on this motion within thirty (30) days of the date it is filed.

You should take this Notice and the Motion to a lawyer at once.

A telephonic hearing will be held on February 15, 2022, at 10:00 a.m. before Judge Carlota M. Bohm in Courtroom B, 54th Floor U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses

will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

Date of Service: 01/12/2022

/s/Stephen R. Franks

Stephen R. Franks, Esquire (0075345)

Adam B. Hall (323867)

Edward H. Cahill (0088985)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Stephen R. Franks.

Contact email is srfranks@manleydeas.com

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 Respondents.

**CERTIFICATE OF SERVICE OF NOTICE OF MOTION, RESPONSE DEADLINE,
AND HEARING DATE REGARDING MOTION FOR RELIEF FROM AUTOMATIC
STAY WITH 30-DAY WAIVER**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on (date)
01/12/2022

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:
first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: 01/12/2022

By: /s/Stephen R. Franks

Signature

Stephen R. Franks, Esquire

Typed Name

P.O. Box 165028, Columbus, OH 43216-5028

Address

614-220-5611

Phone No.

0075345

List Bar I.D. and State of Admission

Stephen R. Franks, Attorney for Creditor, Manley Deas Kochalski LLC, P.O. Box 165028, Columbus, OH 43216-5028 (notified by ecf)

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov (notified by ecf)

Ronda J. Winnecour, Chapter 13 Trustee, Suite 3250, USX Tower, 600 Grant Street, Pittsburgh, PA 15219, cmecf@chapter13trusteedpa.com (notified by ecf)

Glenn R. Bartifay, Attorney for Debtor, 2009 Mackenzie Way, Suite 100, Cranberry Township, PA 16066, gbartifay@bartifaylaw.com (notified by ecf)

Gregory A Rager and Holly J Rager, Debtor, 5868 Madison Avenue, Export, PA 15632 (notified by regular US Mail)